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AGRICULTURAL COUNCIL OF ARKANSAS 80X 1837 WEST MEMPHIS, ARKANSAS 72303

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Received CFTC Records Section

May 4, 2000

COMMENT

Ms. Jean A. Webb, Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street N. W.
Washington, DC 20581

Fax: (202) 418-5521

Proposed New York Cotton Exchange Resolution Prohibiting Cotton From Simultaneously Being Certified for Delivery on Cotton Futures Contracts and Part of Commodity Credit Corporation Loan Stocks

Dear Ms. Webb:

The Agricultural Council of Arkansas represents farmers and agri-businesses located in the alluvial areas of Arkansas. Most members are located in eastern Arkansas. Ag Council members produce more than one-half million bales of cotton annually. Consequently, any rules that have any bearing on the marketing of cotton have a direct effect our members. We oppose the resolution proposed by the New York Cotton Exchange.

It is our opinion that the practice of allowing certified cotton stocks to remain under CCC loan has not in any way negatively affected orderly trading and delivery in the futures market. We can see no logical reason why continuation of the practice will have a negative effect in the future.

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